

**REMARKS**

Claims 1-8 are pending. Claims 5-7 have been withdrawn from consideration. By this Response, claims 1-4 and the specification have been amended. Reconsideration and allowance based on the above amendments and following remarks are respectfully requested.

**Specification**

The Office Action states that the incorporation by reference of applicants' priority document is improper and such phrase should be deleted from the specification. In response, applicants have amended the specification to address this issue. Accordingly, withdrawal of the objection is respectfully requested.

**§112, Second Paragraph**

The Office Action rejects claims 1-4 and 8 under 35 U.S.C. §112, second paragraph as being indefinite. Specifically, with regard to claim 1, the Office Action alleges that the phrase "can recognize" is ambiguous. In response, applicants have amended claim 1 to address this issue.

Also, the Office Action alleges that the reference to each of claims 1 and 3 and claim 4 is confusing and also can be considered improper multiple dependent claim. In response, applicants have amended claim 4 to include the features of claim 1 and 3 instead of incorporating these features by reference.

Therefore, in view of the above, applicants respectfully request reconsideration and withdrawal of the rejection under 35 U.S.C. §112, second paragraph.

### §101 Rejection

The Office Action rejects claims 1-4 and 8 as being directed to non-statutory subject matter. Specifically, the Office Action alleges that the recitation of a “data architecture” in the claims is not statutory itself and should be functionally related to a structural element.

In response, applicants have amended claims 1 and 2 to relate the recited data architecture to a computer readable medium and claim 3 to be recited as a method claim. Applicants respectfully submit that the amendments of the claims address the non-statutory issues. Accordingly, reconsideration and withdrawal of the rejection are respectfully requested.

### Prior Art Rejection

The Office Action rejects claims 1-4 and 8 under 35 U.S.C. §102(e) as being anticipated by Fukuchi, et al. (US 6,546,334). This rejection is respectfully traversed.

In embodiments of the present invention, map data is provided in a specific architecture such that road data is properly connected and displayed even if the mapping apparatus stores both the updated and non-updated data sets. This is accomplished using link identification information and auxiliary link identification corresponding to each road segments of an original link and alternative link, respectively. This allows for the map data processor to recognize a relationship between an original link and an alternative link and therefore appropriately display the correct map data.

In contrast, Fukuchi teaches a system in which map data for a car navigation system is stored in numbered blocks representing segments of map data. The display obtains a certain number of the block of data which represents the displayed map data. When data corresponding to a certain block requires updating, an old block is replaced with a new block and stored in the same spot as the old block. This data is received by broadcast from a map data delivery equipment used to send updated blocks of map data.

Nowhere in Fukuchi does it teach using link identification information corresponding to a part of a road and auxiliary link identification information in order to recognize relationship between original and alternative links of road map data. Fukuchi merely teaches replacing the block of map data with a new block of data, Fukuchi does not teach using link and auxiliary link identification information for original and alternative road links as in embodiments of the present invention. Further, Fukuchi does not teach that an original road link is associated with a plurality of alternative road links.

Therefore, Fukuchi fails to teach, *inter alia*, link identification information identifying a plurality of original links, each of which corresponds to a part of a road constituting an actual road network, and auxiliary link identification information used for identifying a plurality of alternative links which substitute for any of the original links in the map data, wherein the link identification information for each original link replaced by the alternative links is associated with the auxiliary link identification information for the alternative links, whereby a map data processor recognizes a relationship between the original link and the alternative links, as recited in claims 1 and 4 and incorporated in claims 3 and 8.

Therefore, in view of the above, applicants respectfully submit that Fukuchi fails to teach each and every features of claims 1-4 and 8 as required. Accordingly, reconsideration and withdrawal of the rejections are respectfully requested.

#### Conclusion

For at least these reasons, it is respectfully submitted that claims 1-4 and 8 are distinguishable over the cited art. Favorable consideration and prompt allowance are earnestly solicited.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact applicant's representative at the telephone number of the undersigned below in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §1.16 or 1.14; particularly, extension of time fees.

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Respectfully submitted,

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